



**U.S. Department of Justice**

United States Attorney  
District of New Jersey  
*Civil Division*

**ORDER**

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August 28, 2023

**Via Electronic Filing**

Hon. Michael A. Shipp, U.S.D.J.  
United States District Court  
Clarkson S. Fisher Building  
& U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

**Re: Letter Requesting 30-Day Extensions of Time to Answer  
Plaintiffs' Complaints  
*B.Y.C.C., et al. v. United States*, No. 22-cv-06586-MAS  
*J.A.L.C., et al. v. United States*, No. 22-cv-06587-MAS  
*R.J.P., et al. v. United States*, No. 22-cv-06588-MAS**

Dear Judge Shipp:

This Office represents Defendant the United States of America in the above-referenced matters. We write with the consent of Plaintiffs' counsel to respectfully request an additional 30 days for the United States to answer Plaintiffs' Complaints. The current date by which the United States must file its answer in each of the above-referenced cases is August 29, 2023. If the Court grants the United States' extension requests, its answers will be due on September 28, 2023. Good cause exists to grant these extensions due to the length of each Complaint and the additional time that will be needed for this Office to coordinate with and obtain the requisite approvals from other Department of Justice components before answering. **GRANTED**

If this proposal is acceptable to the Court, I respectfully request that Your Honor "so order" this letter and have the clerk file it on the docket. Thank you very much for your consideration of these requests.

Respectfully submitted,

PHILIP R. SELLINGER  
United States Attorney

By: /s/ Samantha R. D'Aversa  
SAMANTHA R. D'AVERSA  
Assistant United States Attorney  
*Attorneys for the United States*

cc: All counsel of record  
AUSA John F. Basiak Jr.  
AUSA Angela Juneau

**IT is so ORDERED this 29th day of  
August, 2023; and it is  
further ORDERED this same Order  
granting the request be filed in all  
related dockets.**



**Douglas E. Arpert**  
**United States Magistrate Judge**

**--Terminates: ECF No. 32 in 22-cv-06586; ECF No. 31 in 22-cv-06588; and ECF  
No. 29 in 22-cv-06587.**